

1 UNITED STATES DISTRICT
2 COURT
3 FOR THE EASTERN DISTRICT OF
4 PENNSYLVANIA
5

6 JOHN J. CUNNINGHAM,
7 DAVID CIUFFETELLI,
8 BENJAMIN DIDONATO and
9 JOHN RUCKI, JR.,

10 Plaintiffs,

11 v.

12 WAWA, INC., RETIREMENT
13 PLANS COMMITTEE OF WAWA,
14 INC., JARED G. CULOTTA,
15 MARGARET DINNENY, MICHAEL
16 J. ECKHARDT, MARIA
17 KALOGREDIS WEEDE, MELANIE
18 HOFFMAN, JAMES MOREY,
19 CATHERINE PULOS, HOWARD
20 B. STOECKEL, DOROTHY
21 SWARTZ, RICHARD D. WOOD,
22 JR., KEVIN WIGGINS, and
23 CHRISTOPHER D. WRIGHT,

24 Defendant.
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Civ. A. No. 18-03355-PD

CLASS ACTION

DECLARATION OF JARROD
SALINAS REGARDING NOTICE
AND SETTLEMENT
ADMINISTRATIVE ACTIVITIES
COMPLETED AS OF JANUARY 8,
2021

DECLARATION OF JARROD SALINAS

I, JARROD SALINAS, declare the following facts to be true and correct and if called as a witness would testify competently to the same:

1. I am employed as a Case Manager by Simpluris, Inc. ("Simpluris"), the claims administrator in the above-entitled action. My business address is 3194-C Airport Loop Drive, Costa Mesa, CA 92626. My telephone number is (714) 640-5643. I am over 21 years of age and authorized to make this declaration on behalf of Simpluris and myself.

2. Simpluris is a class action Settlement Administration Company headquartered in Costa Mesa, California. It was founded by individuals who have each managed hundreds of Settlements along with professionals in the areas of software development, third-party claims administration, mail-house operations and call center support management.

3. I submit this Affidavit to inform the parties and the Court of settlement administration activities completed to date. This Affidavit describes: (i) mailing of the Class Action Settlement Notice, request for Exclusion Form and Claim Form ("Notice Packet") to identified Class Members and (ii) receipt, tracing and re-mailing of undeliverable Notice Packets.

4. On November 29, 2020, Counsel for Defendant provided Simpluris with a mailing list containing the name, last known address, Social Security Number, and pertinent employment information during the Class Period for the Class Members. The Class List contained data for 4,043 unique Class Members. Of the 4,043 Class Members, the Class List included 4,029 mailing addresses and 31 email addresses.

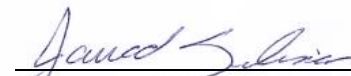
5. The mailing addresses contained in the Class List were processed and updated utilizing the National Change of Address Database ("NCOA") maintained by the U.S. Postal Service. The NCOA contains changes of address filed with the U.S. Postal Service. In the event that any individual had filed a U.S. Postal Service change of address request, the address listed with the NCOA was utilized in connection with

1 the mailing of the Notice Packets.

2 6. On December 3, 2020, after updating the mailing addresses through the
3 NCOA, Notice Packets were mailed via First Class Mail to 4,029 Class Members
4 contained in the Class List. Notice Packets were also emailed to the 31 Class Members
5 with email addresses on file. Class Members were provided until December 30, 2020
6 to submit an Election Form.

7 7. If a Class Member's Notice Packet was returned by the USPS as
8 undeliverable and without a forwarding address, Simpluris performed an advanced
9 address search (i.e. skip trace) on all of these addresses by using Accurint, a reputable
10 research tool owned by Lexis-Nexis. Simpluris used the Class Member's name,
11 previous address and Social Security Number to locate a current address. Through the
12 advanced address searches, Simpluris was able to locate 90 updated addresses and
13 Simpluris promptly mailed Notice Packets to those updated addresses. Ultimately, 65
14 Class Member's Notices were undeliverable because Simpluris was unable to locate a
15 current address.

16 I declare under penalty of perjury under the laws of the State of California that
17 the foregoing is true and correct. Executed this 8th day of January, 2021, at Costa
18 Mesa, CA.

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20 Jarrod Salinas
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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing
**DECLARATION OF JARROD SALINAS REGARDING NOTICE
AND SETTLEMENT ADMINISTRATIVE ACTIVITIES
COMPLETED AS OF JANUARY 8, 2021**, to be served on the counsel
listed below via the Court's ECF system on January 8, 2021:

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